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Via Electronic Mail and ECF (redacted)

Honorable Valerie Caproni, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 443
New York, New York 10007

RE: *In re Navidea Biopharmaceuticals Litigation, Case No. 19-cv-01578-VEC*

Dear Judge Caproni:

We represent Navidea Biopharmaceuticals, Inc. ("Navidea") and Macrophage Therapeutics, Inc. in the above-referenced matter. Pursuant to the Court's Individual Rule 2.C and the So-Ordered Stipulation Regarding Expert Discovery, dated September 23, 2021 (ECF No. 228), we write to request an extension of time for the parties to complete expert discovery in this matter. [REDACTED]

[REDACTED] Navidea respectfully requests that the time to complete expert discovery be extended from November 30, 2021, to December 7, 2021. Defendant Dr. Michael M. Goldberg has consented to this request.

Respectfully submitted,

/s/ Barry M. Kazan

Barry M. Kazan

cc: Alain Baudry, Esq. (via ECF)
Karim Sabbidine, Esq. (via ECF)
Gregory Zimmer, Esq. (via ECF)

Application GRANTED. The deposition of Plaintiffs' expert must occur by **December 7, 2021**.

SO ORDERED.

Valerie Caproni

11/29/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE